



MURIEL GOODE-TRUFANT  
Acting Corporation Counsel

GREGORY ACCARINO  
Senior Counsel  
phone: (212) 356-1945  
gaccari@law.nyc.gov

THE CITY OF NEW YORK  
LAW DEPARTMENT

100 CHURCH STREET  
NEW YORK, NY 10007

October 10, 2024

**BY ECF**

Honorable John G. Koeltl  
United States District Judge  
United States District Court  
Southern District of New York

**APPLICATION GRANTED  
SO ORDERED**

Re: Ryan Paige v. City of New York, et al.  
21 Civ. 11104 (JGK)

  
John G. Koeltl, U.S.D.J.

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and the attorney assigned to represent defendants City of New York, Kevin Major, Gregg Albaum, Jonathan Santos, and Edward Reyes ("City defendants") in the above-referenced matter. The City defendants write to respectfully request a four (4) week extension of the briefing schedule for the City defendants to submit their motion for summary judgment, plaintiff to submit his opposition, and for the City defendants to submit their reply. Plaintiff consents to this request. This is the City defendants' second such request, the first of which was granted by the Court. *See* Dkt. No. 76, Letter Motion, September 16, 2024; Dkt. No. 77, Order, September 17, 2024. This request does not affect any other Court deadlines.

The City defendants respectfully propose the following new briefing schedule for the City defendants' motion for summary judgment:

<b>Deadline:</b>	<b>Original Deadline:</b>	<b>Newly Proposed Deadline:</b>
Deadline for City Defendants' Motion for Summary Judgment	October 18, 2024	November 15, 2024
Deadline for Plaintiff's Opposition	November 15, 2024	December 13, 2024
Deadline for City Defendants' Reply	December 2, 2024	January 4, 2025

By way of background, since the last extension request, the parties conferred regarding the possibility of withdrawing claims prior to summary judgment practice. On October 4, 2024, the plaintiff and City defendants submitted a stipulation of voluntary dismissal regarding certain claims, which was endorsed by the Court. *See* Dkt. No. 78, Letter, October 4, 2024; Dkt. No. 79, Stipulation of Voluntary Dismissal, October 7, 2024. The City defendants request this extension to (1) explore the possibility of whether the remaining claims can be settled prior to summary judgment motion practice, and (2) due to the schedule of the undersigned, who has been busy with deadlines in unrelated matters, including significant time spent towards other motion practice, as well as scheduled leave.

For the foregoing reasons, the City defendants respectfully request a four (4) week extension of the briefing schedule, as discussed above, with plaintiff's consent, for the City defendants to submit their motion for summary judgment, plaintiff to submit his opposition, and for the City defendants to submit their reply.

The City defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/ Gregory J.O. Accarino

Gregory J.O. Accarino

*Senior Counsel*

Special Federal Litigation Division

cc: By ECF  
Sameer Nath  
*Attorney for Plaintiff*